

COMMUNITY INVOLVEMENT PLAN ASHLAND/NSP LAKEFRONT SITE ASHLAND, WISCONSIN

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with assistance from the Sigurd Olson Environmental Institute
and in cooperation with the U.S. Environmental Protection Agency

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1.0 OVERVIEW

1.1 Overview of Community Involvement Plan

Wisconsin Department of Natural Resources (DNR), with the assistance of U.S. Environmental Protection Agency (EPA) and Sigurd Olson Environmental Institute at Northland College (Institute), has prepared this Community Involvement Plan (CIP) to serve as a framework for community involvement and outreach efforts associated with the Ashland/NSP Lakefront site. DNR and EPA will implement the recommendations in this plan to ensure that residents of Ashland and surrounding communities are informed about the progress of the investigation and cleanup, and have meaningful opportunities to provide input into the decision-making process.

Interviews held the week of March 8, 2004, between project staff from DNR, EPA, the Institute, and Wisconsin Department of Health and Family Services (DHFS) and area residents, community leaders and others provide the cornerstone of this plan. Interviewees provided valuable information about their current understanding of the project, environmental and health concerns, and preferences for receiving site information and providing input. The agencies have used this information, and that gained from nearly a dozen public meetings and numerous other outreach efforts, to tailor this community involvement plan to the specific needs and expectations of Ashland-area residents.

Section 1.2 Superfund Process

In 1980, Congress passed the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), commonly referred to as the

Superfund law, to address hazardous waste sites which posed a threat to the public's health and/or the environment. To date, numerous sites nationwide have been cleaned up by EPA, in cooperation with state and tribal partners, local governments, community organizations, and liable parties, also known as Potentially Responsible Parties (PRP).

One of the overall goals of the Superfund process is to involve the public in the decision-making process. Since community residents are or may be affected by the final clean-up decision, public input is critical throughout the process. In fact, 40 CFR § 300.430(c)(2) of the National Contingency Plan (regulations supporting Superfund law) requires the development of a CIP to specify what community relations activities the lead agencies (the state or federal agencies responsible for investigating and cleaning up a site) expects to undertake during the cleanup process.

The Superfund law provides for a lead agency, typically EPA or a state environmental agency, to conduct the cleanup or to oversee cleanup conducted by PRPs. At the Ashland/Northern States Power Lakefront Superfund Site (Ashland/NSP Lakefront Site), EPA and DNR are the lead agencies responsible for investigating the site, involving the community in the decision-making process, and overseeing site cleanup.

Under the Site Specific Superfund Memorandum of Agreement (Appendix P), EPA will serve as lead agency in overseeing the technical aspects of the investigation and cleanup at the Ashland/NSP Lakefront Superfund site. DNR will serve as lead agency in community involvement and outreach activities.

DNR has contracted with the Institute to help design and implement these activities.

DHFS is evaluating whether conditions at the site pose a human health hazard and if so, will assess if any actions are needed to protect human health.

The overall goal of the community involvement program is to promote two-way communication between residents and the agencies responsible for cleaning up the site, and to provide opportunities for meaningful and active community involvement in the cleanup process. This Community Involvement Plan provides information on:

- Issues and questions raised by residents, local officials and others during small group interviews
- The Superfund process
- A brief history of the Ashland/NSP Lakefront Site, background on the community and summary of community involvement efforts.
- The community involvement process and activities to be conducted by the agencies
- A list of information and resources available to the public.

Public input is sought from the very beginning of the Superfund process. Initial contact may only involve updates on what is happening at the site but will later develop into documents and informal or formal meetings that involve more active public input.

Placement on the National Priorities List (NPL), a roster of hazardous waste sites, enables the site to be eligible for an extensive, long-term cleanup program that will permanently and significantly reduce the dangers associated with releases or threats of releases of hazardous substances. Placement on the list also makes the site

eligible for Superfund trust money. The public is given an opportunity to comment on the placement prior to the site being listed on the NPL.

Superfund provides the EPA with a broad range of enforcement authorities, such as searching for the entities responsible for the contamination, ordering those entities to perform scientific and engineering work necessary to investigate, cleanup a site, negotiating legal settlements with PRPs to investigate and cleanup sites, and taking legal actions if PRPs refuse to perform or pay for the cleanup work.

After a site is listed on the National Priorities List, a Remedial Investigation and Feasibility Study (RI/FS) is completed. At some sites, such as at the Ashland/NSP Lakefront Site, the RI/FS begins before listing. The RI/FS is an intensive investigation culminating in a written report that provides an overall picture of the contaminants and the risk they pose, as well as the techniques that will most likely correct the problems at the site.

The Remedial Investigation (installing monitoring wells, taking samples, etc.) results in a definition of the nature and extent of the contamination problem.

Once the degree and extent of contamination are defined, a range of alternatives for correcting conditions at the site is developed. These alternatives are further refined and summarized in the Feasibility Study.

The next stage is the proposal of a remedy. The lead agency communicates its preferred remedy in a document called a Proposal Plan. The Proposed Plan is made available to the public to comment for a minimum of 30 days. A formal public hearing is held to describe the agency's preferred option(s), other options considered, and to formally



(Map of the Superfund Site)

accept the public's oral and written comments on the preferred remedy.

Any member of the public can provide written or oral comments on the preferred option or any of the other identified options. The lead agency will consider the comments received, which may alter or change clean-up decisions made by the agency, and respond to these comments in writing in a document called a Responsiveness Summary.

The final remedy(s) must protect human health and the environment. Emphasis is put on cost-effective and permanent solutions. Remedies must also comply with all relevant federal and state standards. These standards cover water and air quality, and solid and hazardous waste requirements.

Superfund requires that a written document called a Record of Decision (ROD) be prepared once the lead agency considers

public comments and decides on a final remedy. Included in the ROD are a summary of the remedy's clean-up goals, the site background, a summary of the clean-up alternatives being considered, and an explanation of the rationale used to select the remedy. Attached to the ROD is the Responsiveness Summary.

After the Record of Decision is finalized, the next stage involves the Remedial Design (RD) and Remedial Action (RA) stages. This is the step where the selected remedy is designed, constructed, and operated. During the Remedial Design, the plans for the preferred remedy are detailed. Specific plans and specifications for conducting the cleanup are finalized.

The Remedial Action stage is the implementation phase when the proposed remedy is put in place and cleanup of the site begins. Appendix R contains additional information about the Superfund process.

2.0 SITE BACKGROUND

2.1 Site Location

The Ashland/Northern States Power Lakefront site is made up of several properties within the city of Ashland, Wisconsin, and about 10 acres of sediment and surface water in Chequamegon Bay.

These properties include parcels owned by Northern States Power Company of Wisconsin, (referred to as NSP-Wisconsin, doing business as Xcel Energy), Canadian National Railroad (formerly Wisconsin Central Limited Railroad), and the city of Ashland, including Kreher Park and the former wastewater treatment plant. Portions of the sediment and surface water of Chequamegon Bay are also part of the site.

The site's boundaries include U.S. Highway 2 to the south, Prentice Avenue to the east, Ellis Avenue to the west and Chequamegon Bay to the north. Contaminated groundwater exists under these properties, as well as under portions of nearby Our Lady of the Lake Catholic Church and School, and residences on St. Claire Street between Prentice and 3rd Avenue.

2.2 History

Prior to the 1880s, the Chequamegon Bay shoreline was located near what is now the Canadian National Railroad rail corridor. The city-owned property, including the area now known as Kreher Park, was created in the late 1800s and early 1900s by the placement of various fill materials into Chequamegon Bay.

The eastern portion was filled with sawdust, wood waste and other materials from sawmills that operated in the area from the early 1880s until about 1932. The western part was filled primarily with wood,

History Of The Ashland/NSP Lakefront Site

- 1880s to 1950s – Industrial activities occur at the site; businesses include a lumber company and a manufactured gas plant
- 1890s to 1930s – Fill material placed in what is now known as Kreher City Park, ravine filled in
- 1930s – Lumber company closes
- 1940s – Manufactured gas plant closes
- 1980s – Local officials notify the DNR officials about contamination at the site

demolition waste and other waste material from the Ashland area.

From the 1880s through 1947, a manufactured gas plant produced gas for area homes, businesses and street lighting on property now owned by NSP-Wisconsin. A ravine ran through the property, emptying out near the former shoreline to the north (the approximate location of the railroad tracks). Historical maps show that the ravine was open at the start-up of gas production in the late 1800s and was filled by the early 1900s. Investigations have shown that the fill material includes cinders ash, boiler slag, demolition debris and soil.

Groundwater, sediment and soil are contaminated with waste, including tar, oil and other waste consisting of poly-aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs) and metals.

Much of the fill and groundwater underlying portions of Kreher Park is contaminated with the same waste as the filled ravine area, including “free product.” Free product refers to contamination

present in the environment as a separate floating or sinking mass that does not readily mix with or dissolve in water. Contamination has been found to a depth of 70 feet within the Copper Falls aquifer, a water-bearing formation made up of layers of sand and gravel.

Contaminated sediment within Chequamegon Bay is located directly off shore and bounded to the east and west by historic docks that act as breakwaters. The dock structure to the west has been developed into a marina, and the city operates a boat landing to the east.

Sediment in this area contains PAHs, VOCs, and oil and tar as free product consistent with contamination at the rest of the site. Contamination exists mainly within the sediment; however, if the sediment is agitated, oil and tar can be released to the water column and surface, causing a slick to form. To avoid such disturbances, access to this portion of the affected bay has been restricted since 1997 via navigational buoys.

Contamination at the site was discovered in the late 1980s when workers were excavating a trench for a sewer line. Subsequent investigations carried out by the city determined widespread VOC and PAH contamination on its property.

In 1993, the Wisconsin Department of Natural Resources (DNR) began investigating the contamination found on the city property using state-funded cleanup dollars. These investigations concluded that at least some of the contaminants appeared to be the same as that associated with industries that once operated in this area, including the manufactured gas plant.

Beginning in 1994, NSP-Wisconsin, DNR and the U.S. Environmental Protection Agency (EPA) have carried out or overseen

investigations of soil, groundwater and sediment, as well as studied associated risks with the lake environment. The Department of Health and Family Services (DHFS) has completed assessments of potential health risks to people living near the site.

In 1999, a citizen's petition requested that EPA assess the site and determine if it should be listed on the federal Superfund National Priorities List (NPL). The site was proposed for listing in December 2000, underwent a public comment period, and was placed on the NPL in September 2002. In November 2003, NSP-Wisconsin voluntarily entered into an agreement with EPA to complete the investigations under EPA and DNR oversight in order to recommend a final cleanup option.

While this work was underway, NSP-Wisconsin continued to monitor groundwater and conducted two interim cleanups. Interim cleanups are conducted before a remedy is selected for the entire site. In 2000, the company installed an extraction system to begin to pump out and treat tar from the Copper Falls aquifer located under the site. A second cleanup occurred in 2002, when the company excavated and disposed of contaminated soil from a small area near the mouth of the historical ravine (also known as the seep). The excavated soil was replaced with clean top soil. In addition, the city rerouted storm sewers to stop storm water from discharging onto the site.

Since the 2002 NPL listing, NSP-Wisconsin conducted field work, including installation of groundwater monitoring wells in the upper bluff area and at Kreher Park, and tissue sampling of smelt. In addition, DNR and EPA prepared a community involvement plan that outlines how residents will be kept involved and informed as work continues at the site.

As a result of the agreement signed in 2003, NSP-Wisconsin will conduct field work to complete the investigation of the site. Information gained will be used to develop cleanup options. The work, documented in a workplan approved by EPA in December 2004, calls for additional sampling of soil, sediment, air and groundwater. The EPA and DNR will oversee the field work, which is expected to be complete in the summer of 2005.

2.3 Public Health Issues

DHFS has evaluated potential health effects related to contaminants at the Ashland site. Under a cooperative agreement with the federal Agency for Toxic Substances and Disease Registry, the agency has authored five reports that discuss how people could potentially become exposed to site contaminants, and has made recommendations about how to limit exposure. The reports – four health consultations and a health assessment – are available at the information repositories and on DHFS's web site:

<http://dhfs.wisconsin.gov/eh/PHA/phaindex.htm>

The September 2003 public health assessment summarizes the potential health issues:

- **Sediment and Bay Water:** Contact with oily slicks in restricted portions of the bay off Kreher Park may cause skin or eye irritation and skin photosensitivity, resulting in an increased risk of sunburn. Signs are posted in restricted areas. People should avoid swimming, wading, boating or fishing in these areas.
- **Ground Water:** Some Ashland residents obtained water from two artesian wells in Kreher Park (one at the Ashland Marina, the other near the Prentice Ave. boat landing).

Although no contamination has ever been found in these wells, the wells are located in aquifers where contamination has been found. At the recommendation of DNR and EPA, the City closed the wells for public use in September 2004.

- **Fish Consumption:** Tests of fish collected from the bay indicate that fish do not contain levels of site-related chemicals that are a health concern. People should continue to follow fish consumption advisories for Lake Superior, due to findings of mercury and PCBs.
- **Inhalation of Vapors:** During cleanup of coal tar waste, chemicals can escape as vapors. When sensitive people breathe in the vapors, they may experience health effects. DHFS recommends that a comprehensive air management strategy be in place during investigation and cleanup activities.
- **Vapor Intrusion:** Coal tar vapors that move through soil at the upper bluff may enter homes and be a health concern. DHFS believes this unlikely, but recommends indoor air sampling as a precaution.

In addition, a Nov. 2003 health consultation evaluated the potential health issues associated with reuse of the former wastewater treatment plant. The report recommends that a thorough investigation of indoor air be conducted before reuse decisions are made. It also recommends additional measures be taken to prevent trespassing in the area of the settling and treatment tanks.

3.0 COMMUNITY BACKGROUND

3.1 Population and Demographic Characteristics

The City of Ashland's population is 8,620 according to the 2000 census. While the site is located within the City of Ashland, other communities may be affected due to the transport of contamination into Chequamegon Bay and the aquifer. Of note are the communities of the Bad River and Red Cliff Bands of the Lake Superior Chippewa Indians.

The Red Cliff Reservation is located approximately 20 miles north-northwest of the site. Current tribal enrollment includes 5,312 tribal members, with 2,513 of those tribal members living within reservation boundaries.

The Bad River Reservation is located approximately 10 miles east-northeast of the site. The Bad River Band has over 6,000 members. The majority of tribal members live off reservation. Approximately 1,500 live on the reservation in one of four communities: New Odanah, Diaperville, Birch Hill, and Frank's Field.

Both reservations share their coast along Lake Superior and Chequamegon Bay with the Ashland/NSP Site.

Additional information on the community, population trends, local government, education and workforce can be found in Appendix S.

3.2 History of Community Involvement

Ashland area residents have worked on the waterfront since the late 19th century, employed in shipping, lumber, energy, and wastewater treatment jobs. Local residents, as well as tourists, have also enjoyed the

recreational and environmental amenities surrounding the site for generations including fishing, boating, swimming, and walking.

By the time the wastewater treatment plant closed in 1992, residents around the site and throughout the community had become concerned about the potential problems associated with contamination from the site.

Community involvement began several years before the site was placed on the Superfund National Priority List in 2002. DNR partnered with the Ashland-Bayfield League of Women Voters, Sigurd Olson Environmental Institute, Lake Superior Alliance and City of Ashland to organize a public information initiative. This initiative helped inform residents about potential health risks at the site, as well as provided information about the ongoing investigation, cleanup, and redevelopment activities that may be planned by local, state, federal officials and property owners.

From 1995 to 2002, while DNR was investigating contamination at the site and planning for cleanup under state and federal regulations, more than ten public meetings were held to educate Ashland area residents about the contamination site. NSP - Wisconsin, a PRP, assisted in these efforts. In addition to updates of current activities at the site, the meetings covered these topics in more depth:

- Public involvement and participation
- Soil and groundwater pollution
- Health risks and health risk assessments
- Ecological risk assessments
- Remedial Investigations/Feasibility Studies regarding cleanup options
- Interim clean-up activities
- State and federal cleanup processes, including Superfund.

In 1998, area citizen groups contacted Technical Outreach Services for

Communities (TOSC) for technical assistance. TOSC, an EPA funded program, facilitates public involvement by providing independent technical expertise to communities with contaminated sites or air quality problems. As part of the Hazardous Substance Research Center (then located at the University of Michigan, Michigan State University, and Howard University), the TOSC program makes faculty available to help communities develop an understanding of environmental engineering, toxicology, chemistry, microbiology, environmental law and risk analysis.

TOSC program representatives met with project stakeholders on July 12 and 13, 1999. During those meetings, the TOSC program was introduced, and comments and concerns regarding the Ashland site were discussed. Public meetings to discuss the health risks and ecological risks were held in April 2000.

The TOSC program conducted an independent review of the ecological risk assessments reports prepared for the DNR and NSP - Wisconsin by their consultants. A report called *Ecological Risk Assessment of Contaminated Offshore Sediments In Ashland, Wisconsin*, was shared with the public. That report along with other information on the site and the risk assessment process is available at the TOSC website:

<http://www.egr.msu.edu/tosc/ashland/>

3.3 Key Community Issues and Concerns

During one of the first public informational meetings, participants were able to voice their concerns about the site and identify key issues they wanted addressed. The attendees identified their major issues and concerns including the following:

Human Health

- Short term and long term dangers/ effects of exposure to youths and adults, wildlife and aquatics
- Effects on the drinking water supply
- Exposure to vapors
- What potential future problems will arise if nothing is done?

Cleanup/Remediation

- How will oversight of the clean-up take place?
- What clean-up options exist? Are any natural methods being considered?
- How will community acceptance take place, as well as the final remedy be determined?
- How will the community be affected? What about dust, noise, and odors? How will the marina and other recreational opportunities be affected?
- Need to maintain access to the lakefront while limiting access to contaminant areas
- Avoid offensive signage and work on using a positive message about clean-up.

Cost

- How much will the clean-up cost and who will pay for it?
- Will the state get involved?
- If it goes to Superfund, will it become a long legal battle, cost more money, and get no clean-up?

Overall Lake Health

- Need more information to the citizens about how Lake Superior is affected
- What defines a healthy lake?
- Other communities are watching.

Community Image

- How is/will the community image be affected by this site?

Future Land Use

- What are the long-term toxicology effects associated with manufactured gas plant wastes? Are there other sources?

Additional Concerns

- Financial liability to residents of Ashland
- Maximize local control over decisions
- Disposal and air exposure to waste
- Near shore currents, contamination movement
- Sampling of areas where creosote poles are stored
- What to do with contaminants
- Continued education and participation
- Future lakefront pollution
- Long-term monitoring
- Permanent clean-up – quality.

These issues and those summarized below were considered in the development of the community involvement plan.

3.4 Developing a Community Involvement Plan

In March 2004, DNR and EPA, with the assistance of the Institute and DHFS, conducted interviews with about 40 community residents. Interviewees were chosen to represent a cross-section of the community and included area residents, elected officials, tribal leaders and staff, area business owners and managers, recreational lake users, environmental groups, economic development groups, civic clubs, and educators.

The purpose of the interviews, which are required under Superfund regulations, was to listen to what residents said about their current understanding of site contamination and status, concerns related to the site, comments about what they know and want to know about the site, as well as how they would like to receive information. Their

responses, along with comments received at previous public meetings, have been used to develop this Community Involvement Plan to ensure that DNR and EPA meet community needs for information. The following summarizes comments and concerns that were raised during the interviews.

3.5 Site Knowledge and Understanding

Overall, interviewees said their knowledge and understanding about the site was “low” or “medium.” Most people stated they knew where the contamination is and that they should not enter the water to the east of the marina. Few people said they knew what the cleanup process involves, options for cleanup, or how cleanup will occur. Most people said they didn’t understand the Superfund process. Some interviewees indicated they’d like EPA or DNR staff to offer a short training session about the Superfund process.

Interviewees had these concerns or questions about the site:

- What is the process now that the lead agency status has changed?
- How was the decision to bring in the EPA made? Why isn’t DNR solely in charge?
- Why is the process so long? When will cleanup begin? When will this cleanup process be resolved?
- Who is going to pay for it? What will the burden be on the local community?
- What does public involvement mean? What do you want the public to do?
- How will remedies be chosen?
- Why is there still testing at the site?
- Have you found all the responsible parties yet? What is Xcel Energy doing to help with cleanup?
- Does Xcel Energy have insurance to pay for the cleanup?

- Who will be checking Xcel Energy's data to make sure their tests are accurate?
- How much has already been spent on tests and staff? What is "parts per million?"
- Does Superfund have any money?
- Testing: Did they drill into the lake bottom? When they do a sample, is the contamination being spread? Did DNR or another agency take fish eggs from the site and see if they would hatch?
- How can the contamination float to the surface if it's in sediment on the bottom of the bay?

3.6 Perceptions of Health Risks

Overall, people said they knew to keep out of the contaminated water in the bay. Some said they're not sure whether it's safe to eat fish from the bay or if it's safe for boats at the marina. Several people said they were concerned whether Ashland gets its drinking water from pipes in the bay near the site and whether nearby artesian wells were safe.

Interviewees had these questions and concerns about health risks associated with the site:

- Contamination in fish—Are the fish caught in the bay or near the site safe to eat?
- Recreation—Is it safe to swim at the beach at Kreher Park?
- Several people said they had heard of swimmers who developed a rash after swimming near the beach.
- What is the black powder that washes up on the beach?
- Is it OK for dogs to be in the water?
- Artesian water—Is it safe to drink water from the nearby wells?
- Is our drinking water coming from that site? Where does it come from?
- How can the water be contaminated on one side of the breakwater and safe on the other?
- How do storms affect the contaminated area?
- Can I garden in my yard? I find black clumps of something when I dig in my yard.
- You're telling us the site is not dangerous unless we spend a lot of time directly exposed to the contamination. Why is the site a Superfund site then?
- Is the contamination migrating out into the bay?
- Is it safe to boat in the area?
- Is it safe to dig for earthworms in the parking area behind the sewage treatment plant?
- Why is the treatment plant still standing if it's not being used?
- Can't we just let it sit there and not do anything if it's not that dangerous to people?
- What are the bad chemicals at the site? Is it dangerous to breathe them?
- How intrusive will the cleanup be?

3.7 Communication Methods

Interviewees were asked a variety of questions about where they get their news and how they would like to receive information about the Superfund site in the future. Residents said they learned about the site by attending community meetings and that they want a meeting before significant actions or decisions are made so the community has a chance to hear about them and make comments. People said they especially want a meeting that explains all possible alternatives for clean-up so they can have input on the options and decision-making process.

People said they want input well before federal guidelines call for them. They requested opportunities to comment on

possible clean-up alternatives prior to the completion of the feasibility study.

A majority of interviewees preferred to have meetings scheduled at Our Lady of the Lake Church since it is close to the site, while others supported having meetings at Wisconsin Indianhead Technical College (WITC) since it has modern audio-visual equipment, making it easier to hear and see presentations.

Several regional civic, recreational, and church groups expressed an interest in the site and said they are willing to help disseminate updates through their newsletters, email lists, and informal communication networks. There were a number of suggestions about how to reach children through schools.

St.Claire Street neighbors said they appreciated small group meetings in their own homes with representatives from lead agencies when major actions or decisions are being taken or made. Neighbors appreciated the ability to get personalized information directly from agency staff so they could ask questions about possible risks to the neighborhood in a more informal and private setting than a public meeting.

The Ashland *Daily Press* was identified as a main source of news for community residents. Also identified as significant news sources were the Bayfield *County Journal*, the Red Cliff tribal newspaper called *Red Cliff News*, and the Bad River tribal newspaper called *News from the Sloughs*.

People asked for periodic fact sheets that could be emailed or direct mailed to them. A fact sheet should focus on new developments at the site or on the Superfund process. They requested that these be clearly written in non-scientific

language and that illustrations be included when needed to clarify technical information.

There was a wide range of interest in using email and web sites for information sources. Those who preferred getting electronic news do so for several reasons: to reduce paper use, to get news directly on their own computers, and to conveniently direct them to web sites that allow them to choose what and how much information they want. Those who used electronic communication methods said a web site gives them quick and convenient access to more technical information, historical records and links to related sites for more information.

While all interviewees had seen the warning signs posted at the site, many thought they were inadequate. Interviewees suggested the following changes:

- More signs need to be posted starting at the boat launch, around the wastewater treatment facility, and going west along the lake walk to the marina.
- The lettering or font size needs to be larger so children and elderly people can easily read the words.
- The text needs to be simpler for children and others to understand, such as “Keep Out—Toxic Materials,” or wording that is very direct.
- The signs need to be installed to the north side of the lake walk; several currently are on the south side, which makes them illegible to lake walk users.

The area fishing and hunting clubs said they would like presentations at a club meeting to inform members about fish consumption risks or how to boat in the bay. Several people said they would also like to have a short “Superfund 101” course that explains how the process works.

While the main preference for getting news is through area newspapers, interviewees

mentioned they sometimes rely on the radio for information about local issues. Two stations were mentioned specifically as sources for news—WOJB-FM, the Lac Courte Oreilles community station in Reserve, Wisconsin (near Hayward), and WBSZ-FM in Ashland.

Several people requested a kiosk or table display for use in various public locations. Only one group mentioned a desire for posters as a means of distributing information, but said residents would see them if placed in a major public area.

Residents who do not use electronic information sources said they might use an information repository instead.

4.0 COMMUNITY INVOLVEMENT PLAN

Based upon the responses and concerns raised throughout the project, the following activities are planned to provide information and obtain feedback from the community:

Activity 1: Establish and Maintain Relationships with Local Media

Objective: To provide a large number of area residents, above and beyond that possible through direct mail, with current, accurate information about the site and site activities.

Method: Continue to build strong relationships with the editors and reporters at newspapers and radio to ensure they get accurate and current information about site developments. Invite media to public meetings that DNR and EPA hold as well as site tours, press events, and other events. Provide photo opportunities, such as field trips, whenever possible. Maintain a list of press contacts and submit press releases announcing meetings and findings to all

media approximately two weeks and again one week before a meeting and as other events or developments occur. Submit announcements to newspaper or radio community events staff two weeks before a meeting. Media contacts are identified in Appendix H. Take advantage of opportunities to participate in local radio talk shows or panel discussions. Display ads will also be placed with *The Daily Press*, *The Evergreen Shopper* and *The County Journal* to announce meetings approximately two weeks before a meeting. Work with local radio stations including WOJB-FM, the Lac Courte Oreilles community station in Reserve, Wisconsin (near Hayward), and WBSZ-FM in Ashland.

Timeline: One-to-one meetings with editors and reporters at each newspaper, and other media as appropriate, will be scheduled as needed.

Activity 2: Hold Community Meetings

Objective: To update the community on site developments and address community questions, concerns, ideas, and comments.

Method: Conduct periodic public meetings with the community to provide project updates and receive input. Use activities described in this plan to notify the public of the meetings.

Timeline: Community meetings will be held in conjunction with the preparation of this document and the development of the work plan for the RI/FS. Periodic meetings will be held at other project milestones and when input is needed.

Activity 3: Prepare and Distribute Fact Sheets

Objective: To provide residents or community members with easy-to-read

information about the Ashland/NSP Lakefront Site.

Method: Fact sheets will be mailed to all parties on the site mailing list. In addition, copies will be available at the information repository and in various cooperating business locations in the community. Fact sheets will be distributed to the repositories and area locations such as bait shops, Ashland City Hall, Ashland County Courthouse, tribal centers, the Ashland and Spooner DNR Service Centers, Sigurd Olson Institute at Northland College, the Chamber of Commerce, retailers that sell fishing licenses or distribute fish advisories, etc.

Timeline: DNR, in cooperation with EPA, will prepare and distribute fact sheets on a regular basis to coincide with milestones reached in the project.

Activity 4: Outreach to Civic, Environmental, and Community Organizations

Objective: To inform a broader audience than direct mail can provide by offering site information to community groups for presentations at meetings and distribution within their organization; to make lasting connections with related groups that builds trust and partnership within the community.

Method: Provide fact sheets and meeting announcements to civic and community groups whenever appropriate for dissemination through newsletters or other means. Examples include the Ashland-Bayfield League of Women Voters' newsletter, the *ABC Leaguer*, and their email distribution list; the Alliance for Sustainability's newsletter; the area Rod and Gun Club newsletter and email distribution list; *WAVES*, the newsletter published by the Bad River Watershed Association; Ashland Chamber of

Commerce newsletter and website calendar; and other appropriate group newsletters. Develop and deliver presentations for community organizations.

Timeline: Send information when appropriate before meetings or site developments. Respond to request for speakers as needed.

Activity 5: Maintain a Mailing List

Objective: To facilitate the distribution of site-specific information to community members and others.

Method: DNR will create and maintain a mailing list that includes residences, businesses and other establishes close to, or otherwise affected by site activities, as well as tribes, local governments, elected officials, and community and environmental organizations. DNR and EPA will also solicit additional names via fact sheets, newspaper articles, and public meetings. The mailing list will include an email distribution list both of which will be used to provide the parties with timely information. DNR will also maintain a list of establishments – libraries, governmental institutions, coffee shops, bait shops, etc. – to receive both copies of flyers announcing public meetings and multiple copies of fact sheets that members of the public can pick up and take home.

Timeline: DNR has prepared a mailing list and will revise it periodically to keep it current.

Activity 6: Maintain Web Pages

Objective: To provide community members and others access to key site-related background and technical information about the site.

Method: Site-specific information will be posted on agency web sites, including news releases, fact sheets, reports, findings, etc. Because EPA and DNR are working together on the cleanup project, information will likely be posted on the agency site that created a particular document or report.

EPA:

<http://www.epa.gov/region5/sites/ashland>

DNR:

<http://dnr.wi.gov/org/aw/rr/cleanup/ashland.html>.

DHFS:

<http://dhfs.wisconsin.gov/eh/PHA/SiteFS/AshlandFS.pdf>.

Organizations interested in linking their web sites to lead agencies' web sites are invited to do so.

Timeline: Web sites will be updated on a regular basis as new information becomes available.

Activity 7: Hold Neighborhood Meetings

Objective: To help keep community members informed about the site in a more informal and personal way, and to get feedback from affected residents.

Method: Meet with site neighbors in their homes, if they prefer, before a meeting or when there are site-related activities that may impact the neighborhood or raise concerns such as contamination removal, traffic diversions, etc.

Timeline: Neighborhood meetings should be held prior to a significant event or the release of information that may impact the residents.

Activity 8: Conduct Outreach to Local and Tribal Governments

Objective: To provide local governmental and tribal officials with information in a timely manner and to solicit input about local activities and issues important to the project such as redevelopment, tribal cultural practices, etc.

Method: The lead agencies will schedule separate informational meetings with Ashland City Council, Bad River Tribal Council or their representative, the Red Cliff Tribal Council or their representative, the Ashland County Board or designee and the Ashland County Health Board on a periodic basis and prior to community meetings. This will allow officials to get updates directly from lead agencies in a setting more conducive to face-to-face discussion. Work with the appropriate committees of these governmental units to make sure that they are informed of the project status.

Timeline: Meetings will be scheduled at least one week before the community meetings. Supplemental meetings may be scheduled as needed.

Activity 9: Post Site Signs

Objective: To provide on-site information to the public to prevent exposure to contamination.

Method: Supplement existing signs along the waterfront to provide notice to the general public of presence of contamination and potential health impacts. Work with the Ashland County Health Department and DHFS to design signs to address concerns.

Timeline: Design and install signs in spring 2005. Periodically review signs to make sure they are in place and reflect current site conditions.

Activity 10: Set up and Maintain Information Repositories

Objective: To provide convenient locations where residents can go to read and copy official documents and other pertinent information about the site and agency activities.

Method: The repository is a reference collection of site information containing technical reports, the community involvement plan, information about the Technical Assistance Grant (TAG), and the general Superfund process. The Vaughn Library will also maintain a copy of the Administrative Record (see Activity 13). The repositories will contain more information than is available on agency web sites. The agencies are exploring whether the repositories should be maintained in hard copy, CD or both. There will be three public locations for repositories: the Ashland Vaughn Library, the Red Cliff EPA office, and the Bad River Public Tribal Library. Additional site information will be available at the DNR Spooner Service Center and at the EPA office in Chicago. An index of documents available will be maintained at all sites. The addresses of the repositories are in Appendix J.

Timeline: Information repositories have been designated at the Vaughn Library in Ashland, Red Cliff EPA office and Bad River Tribal Library. New documents will be added as they become available.

Activity 11: Hold Availability Sessions

Objective: To provide a forum whereby community members and media representatives can meet informally with project staff.

Method: Hold availability sessions (also known as open houses) at key milestones in the project, either alone (over a four- or five-hour period), or in conjunction with a public meeting. When appropriate, set up displays and photos. Open houses may be held at the site when possible.

Timeline: The sessions will be held as needed.

Activity 12: Provide Assistance to a Community Advisory Group (CAG)

Objective: To enhance community involvement in the cleanup process by providing a public forum where representatives of diverse community interests can discuss their concerns with each other, agency representatives, and the responsible parties. A CAG is a community-driven advisory committee, task force, or board comprised of residents, local officials, businesses, and others affected by a hazardous material.

Method: The agencies will provide information and assistance to the public about a CAG – how to form one, categories of community members to include, and suggested operating guidelines and mission statements. If community members decide to form a CAG, the agencies will support the CAG by attending meetings as needed, providing administrative support and/or other activities as requested by the CAG. Agency representatives will not serve as members of the CAG.

Timeline: The agencies will respond to any requests for help to form a CAG. The issue of formation of a CAG will be discussed at the next public meeting to determine interest in its formation.

Activity 13: Establish and Maintain Administrative Record

Objective: To share with residents the paper and/or electronic file containing all information used by the lead agencies to make a cleanup decision under the Superfund program.

Method: EPA will maintain the Administrative Record, which will be available at the Chicago regional office, the Vaughn Library and on the Bad River and Red Cliff Indian Reservations. See Appendix J for the addresses.

Timeline: At the very latest, the Administrative Record is created prior to the issuance of the Proposed Plan, the document proposing EPA's cleanup plan.

Activity 14: Hold Public Comment Periods

Objective: To give community members an opportunity to review and comment on various project documents, especially the Proposed Plan. This provides the citizens with meaningful involvement in the process and also provides the site team with valuable information for use in making decisions.

Method: EPA and DNR will announce each comment period separately. Announcements will appear in local newspapers and fact sheets; announcements will include information on when comments are due, how to make comments, where to submit comments, etc. Informal public comments may be solicited on the following information/draft documents: draft CIP, preliminary findings of the remedial investigation and feasibility study and preliminary plans for implementation and construction. Formal public comments will be solicited on the Proposed Plan, the

document that outlines EPA and DNR's proposed cleanup plan.

Timing: Comment periods will be announced as appropriate. A comment period is required in conjunction with the announcement of the Proposed Plan and will last a minimum of 30 days.

Activity 15: Coordinate a Technical Assistance Grant (TAG)

Objective: To provide financial resources for a community group to hire technical advisors who can help them interpret technical information about the site.

Method: Information about the TAG program will be provided at public meetings and in site fact sheets. EPA will also provide briefing sessions to interested groups if requested. EPA will provide TAG applications to interested groups. EPA staff are available to answer questions during the application process.

Timeline: EPA and DNR will promote TAGs until one is awarded or the Record of Decision is finalized.

Activity 16: Assign Agency Contacts to Implement Community Involvement and Outreach Tasks

Objective: To provide liaisons between the community and the DNR and EPA, to coordinate community involvement and outreach activities; to ensure prompt, accurate, and consistent responses and information about the site.

Method: EPA and DNR will each designate a community involvement contact (CIC) to handle site inquiries. Briana Bill is the EPA CIC; John Robinson is the DNR CIC. They will work closely with Sharon Jaffess, EPA Remedial Project Manager,

and Jamie Dunn is the DNR Project Manager.

Timeline: The individuals have already been designated.

Activity 17: Investigate Ways to Interact with Area Schools

Objective: To provide information to schools for distribution to students, teachers, and parents.

Method: Use schools' distribution lists and other computer tools to provide information on the project through the school's electronic distribution list or to post information on their school web site. By sending home a meeting notice through school children, parents can also conveniently learn about upcoming meetings.

Teachers can integrate Superfund issues into a multidisciplinary curriculum. DNR and EPA staff has offered to make classroom presentations or site visits as feasible throughout the school year. Displays can be developed and posted in school libraries in Ashland and in the Red Cliff and Bad River tribal schools. Activities such as these will be coordinated with schools through the CESA administrative office, which also has a district-wide newsletter and a web site.

Timeline: These activities will be developed as needed or requested.

Activity 18: Hold Informational Workshops

Objective: To provide interested community members an opportunity to gain more in-depth knowledge about specific topics in a classroom-style format.

Method: Talk with community members as the investigation moves forward; identify various topics they would like in-depth knowledge about. (One possible topic is the Superfund process.) Plan workshops with local residents, local universities, etc., as needed.

Timeline: As needed during the RI/FS.

Activity 19: Develop and Distribute Mobile Displays

Objective: To provide information to the public about the site in non-traditional settings.

Method: Design a free-standing or tabletop display and display it at public locations including public and tribal libraries, the Northern Great Lakes Visitor Center, home shows, county fairs, public meetings and open houses, and other events. Offer the display for loan to community organizations.

Design a poster for public locations including government, tribal, and community locations.

Timeline: Design and distribute the posters or display as needed.

Activity 20: Revise the Community Involvement Plan

Objective: To identify and address community needs, issues, or concerns regarding the site or the cleanup remedy that are not currently addressed in this CIP.

Method: The revised CIP will update the information presented in the previous version of the CIP.

Timing: DNR will revise the CIP in three years or prior to the start of the remedial design phase of the cleanup, whichever comes first.

This document contains information about certain state statutes and administrative rules but does not necessarily include all of the details found in the statutes and rules. Readers should consult the actual language of the statutes and rules to answer specific questions.

The Wisconsin Department of Natural Resources provides equal opportunity in its employment, programs, services, and functions under an Affirmative Action Plan. If you have any questions, please write to Equal Opportunity Office, Department of Interior, Washington, D.C. 20240

This publication is available in alternative format upon request. Please call 608-267-3543 for more information.

For More Information

To order this and any other publications, or to find out more information about the Remediation and Redevelopment Program, please check out our web site at <http://dnr.wi.gov/org/aw/r/r/>



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Appendix A: Agency Contacts

U.S. Environmental Protection Agency

Briana Bill
Community Involvement Coordinator
U.S. Environmental Protection Agency
Office Of Public Affairs (P-19J)
77 West Jackson Blvd.
Chicago, IL 60604
312-353-6646
1-800-621-8431, Ext. 36646
bill.briana@epa.gov

Sharon Jaffess
Remedial Project Manager
U.S. Environmental Protection Agency
Superfund Division (SR-6J)
77 West Jackson Blvd.
Chicago, IL 60604
312-353-0536
1-800-621-8431, Ext. 30536
jaffess.sharon@epa.gov

EPA Web Site:
<http://www.epa.gov/region5/sites/ashland>

Wisconsin Department of Natural Resources – Northern Region

John Robinson
Northern Region Team Supervisor
Remediation & Redevelopment Program
Department of Natural Resources
107 Sutliff Ave.
Rhineland WI 54501
715-365-8976
john.robinson@dnr.state.wi.us

Jamie Dunn
Ashland/NSP Lakefront Site Project
Manager
Department of Natural Resources
810 W. Maple St.
Spooner, WI 54801
715-635-4049
dunnj@dnr.state.wi.us

DNR Web Site:
<http://dnr.wi.gov/org/aw/rr/cleanup/ashland.html>

Wisconsin Department of Health and Family Services

Henry Nehls-Lowe
Epidemiologist, Division of Health
WDHFS
1414 E. Washington Ave.
Madison, WI 53703
608-266-3479
nehlsjl@dhfs.state.wi.us

Jim Morrison
Public Health Educator, Division of Health
WDHFS
1414 E. Washington Ave.
Madison, WI 53703
608-267-3277
morrijm1@dhfs.state.wi.us

DHFS Web Site:
<http://dhfs.wisconsin.gov/eh/PHA/PHApdf/AshlandPHA-final.pdf>

Appendix B: Federal Elected Officials

WI Senator Herbert Kohl
330 Hart Senate Office Building
Washington, D.C. 20510-4903
Washington, D.C.: 202-224-5653
Milwaukee: 800-247-5645
senator_kohl@kohl.senate.gov
<http://kohl.senate.gov/>

WI Senator Russell Feingold
716 Hart Senate Office Building
Washington, D.C. 20510-4904
Washington, D.C.: 202-224-5323
Middleton: 608-828-1200
russell.feingold@feingold.senate.gov
<http://feingold.senate.gov/>

WI Congressman David Obey
7th Congressional District
2462 Rayburn House Office Building
Washington, D.C. 20515-4907
Washington, D.C.: 202-225-3365
Wausau: 715-842-5606
Use his automated website to send an email.
www.house.gov/obey

Appendix C: State Elected Officials

Governor Jim Doyle
State Capitol
115 East
Madison, WI 53702
608-266-1212
<http://www.wisgov.state.wi.us/>

State Representative Gary Sherman
74th Assembly District
P.O. Box 8953
Room 119 North, State Capitol
Madison, WI 53708-8953
Madison: 608-266-7690 Port Wing: 715-774-3691
rep.sherman@legis.state.wi.us
<http://www.legis.state.wi.us/assembly/asm74/asm74.html>

State Senator Robert Jauch
25th Senate District
P.O. Box 7882
Room 313 South, State Capitol
Madison, WI 53707-7882
Madison: 608-266-3510 Poplar: 715-364-2438
sen.jauch@legis.state.wi.us
<http://www.legis.state.wi.us/senate/sen25/sen25.html>

Appendix D: Local Officials

Fred Schnook
Mayor
City of Ashland
601 W. Main St.
Ashland, WI 54806
715-682-7071
fschnook@coawi.org
<http://www.ci.ashland.wi.us/>

Dave Frasher
City Administrator
City of Ashland
601 W. Main St. Ashland, WI 54806
715-682-7071
dfrasher@coawi.org
<http://www.ci.ashland.wi.us/>

Mary Rehwald
Ward 6 Representative
Ashland City Council
225 Mead Hall, Northland College
Ashland, WI 54806
715-682-1341
mrehwald@northland.edu

Carol Ante
County Board Representative
610 Second Street West
Ashland, WI 54806
715-682-3131

Margaret Kurilla, Chair
Ashland County Board of Supervisors
201 W. Main St., Room 301
Ashland, WI 54806
715-682-7015

Tom Kiewig, Administrator
Ashland County
201 W. Main St.
Ashland, WI 54806
715-682-7015
<http://www.wisconline.com/counties/ashland/>

Terry Kramolis, Health Officer
Ashland County Health Department
301 Ellis Ave.
Ashland, WI 54806
715-682-7028
tkramolis@hsd.co.ashland.wi.us
<http://www.co.ashland.wi.us/page9.html>

Appendix E: Tribal Contacts

Donald Moore, Sr.
Chairperson
Bad River Band of Lake Superior
Chippewa
P.O. Box 39
Odanah, WI 54861
715-682-7111 Phone
715-682-7118 FAX

Rae Ann Maday
Natural Resources Department
Bad River Band of Lake Superior
Chippewa
I Maple Lane
P.O. Box 39
Odanah, WI 54861
715-682-7123
rmaday@badriver.com

Ray DePerry
Tribal Chairman
Red Cliff Band of Lake Superior
Chippewa
88385 Pike Road, Hwy 13
Bayfield, WI 54814
715-779-3700
<mailto:rdeperry@redcliff-nsn.gov>

Charlotte Dawn
Environmental Protection Office
Red Cliff Band of Lake Superior
Chippewa
88385 Pike Lake Rd, Hwy 13
Bayfield, WI 54814
715-779-3650
cdawn@redcliff-nsn.gov

Appendix F: Local Environmental , Educational Institutions and Community Groups

Bill Ehmann
Executive Director
Sigurd Olson Environmental Institute
1411 Ellis Ave.
Ashland, WI 54806
715-682-1874
wehmann@northland.edu
<http://www.northland.edu/soei/>

Betty Harnish
Ashland/Bayfield County League of
Women Voters
2120 W. LSD
Ashland, WI 54806
715-682-5476

Bob Olsgard
Director
Lake Superior Alliance
310 Stuntz Rd. #301
P.O. Box 33
Ashland, WI 54806
Phone: 866-296-5253
info@superioralliance.org
www.superioralliance.org

Mary McPhetridge
Executive Director
Ashland Chamber of Commerce
P.O. Box 746
Ashland, WI 54806
715-682-2500
ashchamb@cheqnet.net

Tim Kane
Alliance for Sustainability
P.O. Box 622
Washburn, WI 54891

Kim Bro
Sigurd Olson Environmental Institute
1411 Ellis Ave.
Ashland, WI 54806
715-682-1810
KBro@northland.edu

Becky Sapper
Chequamegon Bay Watershed Project
Director
The Nature Conservancy
707 Main St. West
Ashland, WI 54806
715-682-5789

Appendix G: NSP - Wisconsin Contacts

Mike BeBeau
Xcel Energy
301 E Lakeshore Dr.
Ashland, WI 544806
715-682-6936
michael.s.bebeau@xcelenergy.com

Brian Elwood
Xcel Energy
1414 W Hamilton Ave
P.O. Box 8
Eau Claire, WI 54702
715-839-2577
brian.t.elwood@xcelenergy.com

Appendix H: Media Contacts

Ashland Daily Press
122 W. 3rd St.
Ashland, WI 54806
715-682-2313
ashpress@cheqnet.net
<http://www.ashlandwi.com/>

County Journal-Bayfield County
(Weekly)
P.O. Box 637
Washburn, WI 54891
715-373-5500
ctyjourn@baysat.net
<http://www.washburnwi.com/placed/>

The Evergreen Country Shopper
417 Ninth Ave. West
Ashland, WI 54806
715-682-8131

Duluth News Tribune (Daily)
Steve Kuchera
424 W. First St.
Duluth, MN 55802
218-723-5281
newsroom@duluthnews.com
<http://www.duluthsuperior.com/mld/duluthtribune/>

WATW-AM 1400
WJJH-FM 96.7, WBSZ-FM 93.3,
WNXR-FM 107.3
P.O. Box 613
Ashland, WI 54806
715-682-9338
productions@baybroadcasting.com

WRZC FM 92.3
P.O. Box 1470

Bayfield, WI 54814
715-779-3755
fapc@charterinternet.net

WOJB-FM 88.9
13386 W
Trepania Rd.
Hayward, WI 54843
715-634-2100
generalmanager@wojb.org
<http://www.wojb.org>

KUWS Public Radio
Mike Simonson
1800 Grand Ave
Superior, WI 54880
JMunson@uwsuper.edu
<http://kuws.fm/>

Daily Telegram
1226 Ogden Ave,
Superior, WI 54880
<http://www.superiorwi.com/>

News from the Sloughs
P.O. Box 39
Odanah, WI 54861
715-682-7895
brnews@ncis.net
<http://www.ncis.net/brnews/index.htm>

Red Cliff News
Bob Bear
88385 Pike Rd.
Bayfield, WI 54814
715-779-3178
rcnews@charter.net
<http://www.redcliff.org/redcliff.php?path=events&page=index.html>

Appendix I: Public Meeting Locations

Our Lady of the Lake Catholic Church
201 Lake Shore Dr. East
Ashland, WI 54806
715-682-7620

Wisconsin Indianhead Technical
College-Ashland (WITC)
2100 Beaser Ave.
Ashland, WI 54806
715-682-4591

Appendix J: Information Repository and Administrative Record Locations

Administrative Record Locations

Vaughn Public Library
502 W. Main St.
Ashland, WI 54806
715-682-7060

U.S. EPA
77 W. Jackson Blvd
7th Floor Records Center
Chicago, IL 60604
312-886-0900

Bad River Public Library
Norma Soulier, Librarian
P.O. Box 39
100 Maple St.
Odanah, WI 54861
715-682-7111, ext. 1532
biizhew@ncis.net

Red Cliff EPA Office (Fish Hatchery)
88385 Pike Road, Hwy 13 (Mailing address)
86395 Hwy 13, Brood Stock Building
Bayfield, WI 54814
Contact 715-779-3650 to make an appointment

Information Repository Locations

Vaughn Public Library (see above)

Bad River Public Library (see above)

Red Cliff EPA Office (see above)

DNR Spooner Service Center
810 West Maple St.
Spooner, WI 54880
715-635-4940

Appendix K: Web Site Addresses

US Environmental Protection Agency

<http://www.epa.gov/region5/sites/ashland/index.htm>

Wisconsin Department of Natural Resources

<http://dnr.wi.gov/org/aw/rr/cleanup/ashland.html>

Wisconsin Department of Health and Family Services

<http://dhfs.wisconsin.gov/eh/PHA/phaindex.htm>

Technical Outreach Services to Communities

<http://www.egr.msu.edu/tosc/ashland/>

Appendix L: List of Publications

The table below lists the major documents that have been prepared for the Ashland site either by DNR, NSP - Wisconsin and their consultants.

NSP – Wisconsin			
Date	# of Pages	Report Title	
1989	152	Environmental Assessment: Wastewater Treatment Plant Site	Northern Environmental Technologies
1991	237	Specifications For Bayfront Area Sanitary Sewer Improvements – Ashland, WI	Bonestroo, Rosene, Anderlik & Associates
03/01/94	78	Waterfront Plan	Discovery Group, Ltd & Jane Silberstein
08/01/94	148	Remedial Investigation Interim Report	Short Elliott Hendrickson Inc. (SEH)
02/01/95	316	Existing Conditions Report	SEH
03/01/95	48	Final Report	Dames & Moore
06/01/95	270	Draft- Site Investigation Report & Remedial Action Plan	Dames & Moore
08/01/95	332	Site Investigation & Remedial Action Plan Final Report	Dames & Moore
01/01/96	25	Sediment Investigation Proposal for Environmental Services	SEH
02/01/96	93	Draft Remediation Actions Options Feasibility Study	SEH
02/01/96	138	Sediment Investigation Work Plan	SEH
07/01/96	429	Sediment Investigation Report	SEH
08/01/96	269	Supplemental Groundwater Investigation-Final Report	Dames & Moore
02/01/97	117	Copper Falls Aquifer Groundwater Investigation	Dames & Moore
05/01/97	64	Comprehensive Environmental Investigation Report	SEH
08/01/97	31	Comprehensive Feasibility Study, Risk Assessment, Treatability Studies & Additional Investigation	SEH

10/01/97	235	Aquifer Performance Test & Groundwater Monitoring Results	Dames & Moore
03/01/98	435	Supplemental Investigation Report	SEH
03/01/98	23	Exploration Trench Activities and Finding	Dames & Moore
04/01/98	44	Remedial Action Plan: Lower Copper Falls Formation Aquifer	Dames & Moore
04/01/98	172	Ecological Risk Assessment: Problem Formulation	SEH
06/01/98	150	Baseline Human Health Risk Assessment	SEH
06/06/02	279	Phase II Environmental Site Assessment (also see Report #60)	Mid States Associates (MSA)
10/01/98	247	Ecological Risk Assessment	SEH
12/01/98	146	Remediation Action Options Feasibility Study	SEH
03/01/99	188	Ecological Risk Assessment: Ashland Lakefront Property (Final Draft)	Dames & Moore
03/01/99	137	Remedial Action Options Feasibility Study – Final Report	Dames & Moore
03/01/99	328	Supplemental Facility Site Investigation & Remedial Action Options Evaluation Report	Dames & Moore
10/01/99	201	1999 Supplemental Site Investigation	Dames & Moore
02/01/01	98	Interim Response Coal Tar Recovery System- Volume 1 Construction Documentation Report	URS
02/01/01	354	Interim Response Coal Tar Recovery System- Volume 2 Operation, Maintenance, and Monitoring Plan	URS
02/01/01	217	Interim Response Coal Tar Recovery System-Final-Progress Report (Report #001)	URS
06/01/01	313	Sediment Sample Results Volume I of III	URS
06/01/01	319	Sediment Sample Results Volume II of III	URS
06/01/01	342	Sediment Sample Results Volume III of III	URS
06/01/01	209	3rd Addendum to Report: Comparative Analysis of NAPL Residues	Gas Technology Institute (GTI)
07/14/01	116	Interim Response Coal Tar Recovery System-Final-Progress Report (Report #002)	URS
10/22/01	141	Interim Response Coal Tar Recovery System-Final-Progress Report (Report #003)	URS
10/29/01	118	Investigation, Interim Remedial Action Options, and Design Report	SEH

12/07/01	353	Air Monitoring Results from Pipe Investigation Conducted during week 09/17/01	URS
12/20/01	104	Interim Response Coal Tar Recovery System-Final-Progress Report (Report #004)	URS
10/01/01	287	Phase I Environmental Site Assessment (also see Phase II DNR Report #29)	MSA
01/15/02	286	4th Addendum to Report: Comparative Analysis of NAPL Residues	GTI
01/22/02	157	Environmental Forensic Investigation of Subsurface Pipes Containing Tar Residues	Battelle
02/19/02	37	Clay Tile Investigation	URS
02/19/02	441	Ecological Risk Assessment Supplement	SEH
02/28/02	80	Interim Response Coal Tar Recovery System-Final-Progress Report (Report #005)	URS
08/01/02	115	5th Addendum to Report: Comparative Analysis of NAPL Residues	GTI
08/21/02	93	Seep Interim Action Documentation	URS
09/25/02	188	Interim Response Coal Tar Recovery System-Final-Progress Report (Report #007)	URS
06/02/02	172	Interim Response Coal Tar Recovery System-Final-Progress Report (Report #006)	URS
01/03/03	162	Interim Response Coal Tar Recovery System-Final-Progress Report (Report #008)	URS
02/27/03	228	Addendum – QAPP Task Specific - OU #4 Winter 2003 Sediment Sampling	URS
05/15/03	122	Interim Response Coal Tar Recovery System-Final-Progress Report (Report #009)	URS

Appendix M: Glossary

Administrative Order on Consent (AOC): A legal agreement under the authority of the Superfund law between the EPA or a natural resource trustee and potentially responsible parties (PRPs) whereby PRPs agree to perform or pay the cost of an action or group of actions to be taken at the site.

Administrative Record: A file that is maintained, and contains all information used by an agency to make a decision pursuant to its authority under the Superfund law. The agency makes the administrative record available for public review.

Cleanup: Actions taken to deal with a release or threatened release of hazardous substances that could affect public health or the environment. The term is often used broadly to describe various response actions or phases of responses, such as the remedial investigation/feasibility study.

Clean-up Goals: A set of clean-up target levels to be attained for specific contaminants when cleaning up the site.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA): A Federal law passed in 1980 and modified in 1986 by the Superfund Amendments and Reauthorization Act. The Acts, which can be found starting at Section 9601 of Title 42 of the U.S. Code, created a special tax that goes into a Trust Fund, commonly known as Superfund, which may be used to investigate and cleanup abandoned or uncontrolled hazardous waste sites. Under the program, EPA can: 1) make agreements with potentially responsible parties to undertake investigation and cleanup of Superfund designated sites under EPA supervision, or 2) use the funds from the Superfund to pay for investigation and cleanup of Superfund sites. If EPA uses Superfund money to pay for site investigation and cleanup when parties responsible for the contamination cannot be located or are unwilling or unable to perform the work, then EPA may take legal action against the potentially responsible parties to reimburse the Superfund for those “response costs.” In addition, EPA has authority under the Superfund law to administratively order potentially responsible parties to undertake certain investigatory or clean-up actions. The Superfund law also allows natural resource trustees to recover damages for injuries to natural resources resulting from the contamination.

Hazard Ranking System (HRS): A scoring system used to evaluate potential relative risks to public health and the environment from releases or threatened releases of hazardous substances. EPA and/or a state response agency uses the HRS to calculate a site score (0 to 100) based on the actual or potential release of hazardous substances from a site through air, surface water, or ground water. This score is the primary factor used to decide if a hazardous waste site should be placed on the National Priorities List (NPL).

National Priority List (NPL): A federal roster of uncontrolled contamination sites that actually, or potentially, threaten human health or the environment and are eligible for extensive, long-term investigation and cleanup under the Federal Superfund program.

Polycyclic Aromatic Hydrocarbons (PAH): PAHs are a group of over a hundred different compounds and each is based on multiple, fused benzene rings. PAHs are commonly found in petroleum and are also formed during the incomplete burning of coal, oil, gas, wood, garbage, or other organic substances, such as tobacco and charbroiled meat. Many PAHs can be harmful to your health and some can cause cancer.

Potentially Responsible Party (PRP): Parties that have been found to be potentially legally responsible for contamination and/or cleanup at a site. Under Superfund, PRPs can include persons (including companies)

that are owners or operators of Superfund designated sites, persons who arranged for disposal of hazardous substances at a Superfund site, or certain persons who transported hazardous substances to a Superfund site.

Proposed Plan: A document that describes the clean-up alternatives evaluated for a Superfund site and identifies the preferred alternative and the rationale for the preference. A public comment period and opportunity for a public hearing takes place after release of the Proposed Plan and before the Record of Decision.

Record of Decision (ROD): A document signed by EPA and/or the lead agency outlining the selected remedy for a Superfund site. The ROD includes a responsiveness summary, which responds to comments raised during the public comment period for the Proposed Plan.

Remedial Investigation/Feasibility Study (RI/FS): A two-part study that is completed before any Superfund-related remedial cleanup can begin. The first part is the Remedial Investigation, which is a study to determine the nature and extent of the contamination at the site. The second part is the Feasibility Study, which is an identification and evaluation of various clean-up alternatives. When completed, the RI/FS forms the basis for the EPA's or lead agency's decision as to what clean-up alternative should be selected for a particular Superfund site.

Risk Assessment: A study conducted as part of the Remedial Investigation to determine the threats posed to human health and the environment if the site's contamination is left unaddressed. The study takes into account such factors as the contaminant's toxicity and the paths and likelihood of exposure.

Sediment: Unconsolidated materials on the bottoms of rivers and lakes. Sediment consists primarily of clay, silt, sand, and gravel along with some organic material from decomposing plants and animals.

Superfund: The common name for the clean-up fund created by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). It is often also used to refer to the clean-up process under CERCLA.

Volatile Organic Compounds (VOC): Low-molecular weight compounds that are liquids at room temperature, but readily evaporate. Many VOCs are often used commercially as solvents and include benzene, toluene, methylene chloride, and methyl chloroform.

Appendix N: Community Interview Questions

Name of Interviewee _____	Date of Interview: _____
Address: _____	
Phone: _____	
Affiliation: _____	

Introductions

Introduce DNR, EPA, DHFS, and Institute interviewers

Why we are here

Confidentiality

Tell us a little about yourself. (How long have you lived in the area? Do you use the Waterfront or Chequamegon Bay or depend on it for your business?)

Section 1: Site Knowledge and Understanding

1. What do you think is the most important environmental problem facing Ashland? What other issues are prominent?

2. When do you first remember becoming aware of the problems at the Ashland lakefront site? Do you remember how you first heard about them?

3. In your opinion, what is the biggest problem related to the site? Are there other problems?

4. Do you know the location of the site and how it came to be?

5. Tell us where you think all the contamination is? (Follow up by showing them where contamination is on the map.)

6. How would you rank local interest in the Ashland Superfund site—low, medium, high?

7. How would you rate your understanding of the site's problems—low, medium, high?

8. What things concern you about the site, the site investigation, or what you may have heard about a future clean up?

9. Who have you heard are potentially liable parties?

10. What have you heard is the role of the EPA? The DNR? Wisconsin Health? Xcel? The Sigurd Olson Environmental Institute?

11. Are you interested in learning more about who is doing what? How do you think people perceive each of these organizations?

12. How would you rank your understanding of how the federal Superfund process works at a site like this—low, medium, high? Is this something you would be interested in learning more about?

Section 2: Perception of Health Risks

1. What do you think are the important health issues about the site?
2. Do you or people you know believe your health may be affected by the contamination at the site? If so, tell us how?
3. Have you heard stories about illnesses caused by site chemicals? If yes, please explain.
4. Do you think you may be exposed in the future from chemicals at the site? If so, how?
5. Have you seen the warning signs on the bicycle path at Kreher Park? Do you think people are abiding by the warnings?
If not, what do you think we could do?

Section 3: Information Sources

1. Where do you get most of your information about issues like this? TV, radio, newspaper, mailings, neighbors, agency officials, etc. How would you PREFER to get information?
2. Have you contacted anyone so far with questions about this site? If so, who? If so, was this person helpful in answering your questions?
3. Have you participated in meetings concerning the site?
If not, why not?
If so, were they useful? What could we do to improve them?
4. Which newspapers or circulars do you regularly read, if any? How would you rate the accuracy of the newspaper coverage—poor, good, excellent?
5. If we put an ad in the Daily Press announcing a meeting, are you likely to see it?
6. What is the best way for us to keep you informed (fact sheet mailings, public meetings, newspaper articles, web site, city council meetings, etc.)?
7. Do you recall seeing earlier published materials about the site such as fact sheets? (Hand person sample fact sheet). If so what did you think? Were they understandable? If we mailed a fact sheet to you, would you be likely to read it? What length would be best? How often?
8. Have you ever visited the site files or CDs at the Vaughn Library? If not, why not? If so, what did you think? Do you think you ever would use the files there? If everything were on CD, would you use the CD? Would it make a difference if you could check out the CD?
9. Have you ever consulted the DNR or EPA web site about the Ashland site? Can you see yourself doing so in the future? If so, what kind of information would be most useful to you?

10. Is there anything else you want to tell us?

Section 4: For Municipal or Elected Officials

1. Do you receive calls about the site?

If so, how often?

Do you have the information you need to answer questions?

2. What can EPA, DNR and Wisconsin Department of Health do to keep you informed?

Appendix O: Fact Sheets

Ashland/Northern States Power Lakefront Site Community Involvement Plan, November 2004:

<http://dnr.wi.gov/org/aw/rr/archives/pubs/RR723.pdf>

A History of the Ashland/Northern States Power Lakefront Site, February 2005:

<http://dnr.wi.gov/org/aw/rr/archives/pubs/RR645.pdf>

What is Superfund? October 2002:

<http://dnr.wi.gov/org/aw/rr/archives/pubs/RR122.pdf>

Ecological Risk Assessment for the Contaminated Offshore Sediments in Ashland, Wisconsin:

http://www.egr.msu.edu/tosc/ashland/Summary_of_TOSC_Eco-Risk_Review.pdf

Appendix P: SITE-SPECIFIC SUPERFUND MEMORANDUM OF AGREEMENT

THE ASHLAND/NORTHERN STATES POWER LAKEFRONT SUPERFUND SITE

1. PARTIES

This Site-Specific Superfund Memorandum of Agreement (SMOA) is entered into by and between the following governmental parties who sign the Site-Specific SMOA:

- The United States Environmental Protection Agency (EPA) Region 5, Superfund Division
- The Wisconsin Department of Natural Resources (WDNR)

2. PURPOSE

The general purpose of this Site-Specific SMOA is to create a structure and a process within which each Party may effectively and efficiently coordinate its interests and concerns related to the work at the Site with those of the other Party, while assuring the responsibilities of each Party are fulfilled to the maximum extent possible to derive maximum net environmental benefit, optimize federal and state expertise and available resources, and to avoid unnecessary duplication of costs and efforts. This Site-Specific SMOA will become an appendix to the Superfund State Contract or Cooperative Agreement.

The specific purposes of this Agreement are the following:

1. To clarify for each Party its relationships with the other Party and its responsibilities for coordination of Site activities.
2. To establish primary contacts for each Party.
3. To designate which agency will be the lead agency and support agency for the various technical, legal, and public involvement tasks defined in the following paragraphs.
4. To oversee completion of the Remedial Investigation and Feasibility Study (RI/FS) by the potentially responsible party (PRP) signatory to the Administrative Order on Consent (AOC), U.S. EPA Docket No. V-W-04-C-764, and any appropriate early actions taken by the PRP. In doing so, the Parties will ascertain the nature and extent of contamination at, from, and to the Site, and ensure the implementation of an effective cleanup of the Site in a manner consistent with the requirements of CERCLA, 42 U.S.C. §§ 9601 et. seq., and the National Contingency Plan (NCP), 40 C.F.R. Part 300.

5. To perform public involvement activities.
6. To provide procedures to resolve any conflicts between EPA and WDNR regarding implementation of their respective Lead and Support Agency roles for the Site;

3. AUTHORITY AND APPLICABILITY

1. Each Party has authority to enter into this Site-Specific SMOA. EPA and WDNR have express statutory authority to respond to releases of hazardous substances related to the Site.
2. This Site-Specific SMOA is effective upon signature by both EPA and WDNR. Any Party may withdraw from this Site-Specific SMOA upon thirty (30) days written notice. This Site-Specific SMOA will be regularly reviewed by the Parties and may be modified by written agreement by all Parties.
3. This Site-Specific SMOA is not legally binding.
4. If at any time a conflict arises between the language of the Site-Specific SMOA and the language contained in a Cooperative Agreement, Superfund State Contract, or an enforcement agreement or order, the Cooperative Agreement, Superfund State Contract, or enforcement agreement or order language shall control.

4. EPA/WDNR LEAD AGENCY AND SUPPORT AGENCY ACTIVITIES

1. EPA is designated RI/FS Lead Agency for the oversight of the RI/FS. WDNR is designated RI/FS Support Agency for the oversight of the RI/FS. EPA is designated Public Involvement Support Agency for performance of public involvement activities. WDNR is designated Public Involvement Lead Agency for performance of public involvement activities.
2. The RI/FS Lead Agency maintains the primary responsibility for overseeing the PRP's work as defined in the AOC. The RI/FS Support Agency plays a review and concurrence role and provides specific information as necessary to the RI/FS Lead Agency (e.g., identification of potential applicable or relevant and appropriate requirements). The Public Involvement Lead Agency maintains the primary responsibility for developing and implementing the Community Relations Plan, conducting community interviews, providing notice for public meetings, preparing fact sheets for the public, maintaining a site mailing list and information repositories, and other public involvement activities as outlined in the community relations plan. The Public Involvement Support Agency reviews and concurs on

public involvement materials and strategies as outlined in the Community Relations Plan. In addition, EPA will take the lead in preparing the Proposed Plan, the Administrative Record, as well as associated public comment and hearing tasks with the review and concurrence of WDNR. Media relations and information requests are a joint activity of both Parties.

3. EPA has used its CERCLA Section 104 authority to issue an AOC for PRPs to voluntarily perform a remedial investigation/feasibility study. Any interim action work will be pursuant to orders, consensual or unilateral, issued pursuant to Section 106, and any agreement to perform CERCLA remedial action will be embodied in a Consent Decree (CD) entered in the Federal District Court of Wisconsin in accordance with Sections 104 and 122 of CERCLA.

5. COMMUNICATION / COORDINATION / CONTACTS

Every Party will maintain communication with other Parties through the following contacts:

For EPA:

Primary Contact

Sharon Jaffess, Remedial Project Manager
Superfund Division
Remedial Response Branch #1
Remedial Response Section #3
77 West Jackson Blvd.
SR-6J
Chicago, IL 60604
312-353-0536
jaffess.sharon@epa.gov

Legal Contact

Craig Melodia, Assistant Regional Counsel
Office of Regional Counsel
77 West Jackson Blvd.
C-13J
Chicago, IL 60604
312-353-8870
melodia.craig@epa.gov

Public Involvement / Press Contact

Briana Bill, Community Involvement Coordinator
Office of Public Affairs (P-19J)

77 West Jackson Blvd.
Chicago, IL 60604
312-353-6646
bill.briana@epa.gov

Press Contact (Alternate)

Mick Hans, Press Officer
Office of Public Affairs (P-19J)
77 West Jackson Blvd.
Chicago, IL 60604
312-353-5050
hans.mick@epa.gov

For WDNR:

Primary Contact

James Dunn, Project Coordinator
Wisconsin Department of Natural Resources
810 West Maple Street
Spooner, WI 54801
715-635-4049
James.Dunn@dnr.state.wi.us

Legal Contact

Deborah Johnson, Staff Attorney
Wisconsin Department of Natural Resources
101 South Webster Street LS/5
P.O. Box 7921
Madison, WI 53707-7921
608-267-0846
Deborah.Johnson@dnr.state.wi.us

Public Involvement / Press Contact

John Robinson, Northern Region Team Supervisor
Wisconsin Department of Natural Resources
107 Sutliff Avenue
Rhinelander, WI 54501
715-365-8976
John.Robinson@dnr.state.wi.us

6. RESPONSIBILITIES OF LEAD AND SUPPORT AGENCIES

1. Responsibilities of RI/FS Lead Agency

1. Oversee the PRP's work as specified in the AOC, Statement Of Work (SOW), and RI/FS Work Plan in accordance with the designated schedules;
 2. Ensure compliance with the AOC or enforce stipulated penalties;
 3. Communicate with the Support Agency and ensure that the PRP provides the Support Agency with all major work products in a timely manner so the Support Agency may provide comments to the Lead Agency;
 4. Consult with the Support Agency on remedy selection and other significant issues;
 5. Carry out the designated responsibilities in accordance with the time frames mutually agreed upon by both parties (and specified in the site-specific cooperative agreement).
 6. Establish the Administrative Record for Selection of Response Action in accordance with the NCP, Section 300.800.
2. Responsibilities of RI/FS Support Agency
1. To review and comment on major work products submitted by the Lead Agency or PRP (the PRP is required to submit all work products to the Support Agency simultaneously to the Lead and Support Agencies) within a timely manner (thirty calendar days);
 2. To communicate with the PRPs only through the Lead Agency or after providing notice to the Lead Agency that the Support Agency intends to communicate directly with the PRP regarding the Site.
3. Responsibilities of Lead Public Involvement Agency
1. Conduct community interviews;
 2. Develop a Community Relations Plan and provide it to the Support Agency for review and comment;
 3. Implement the Community Relations Plan;
 4. Maintain site mailing list;
 5. Coordinate public information meetings;
 6. Provide public notice for public information meetings;
 7. Draft fact sheets and outreach materials;
 8. Maintain local information repositories;
 9. Maintain media relations jointly with the Support Agency;
 10. Process information requests jointly with the Support Agency;
 11. Provide public involvement records to EPA for inclusion into the Administrative Record, in compliance" with the record keeping requirements of the NCP, 40 CFR 300.800 *et. seq.*

4. Responsibilities of Public Involvement Support Agency

1. Assist Lead Agency in community interviews and provide comments on the Community Relations Plan;
2. Provide comments on draft fact sheets and outreach materials in a timely manner to the Lead Agency;
3. Coordinate all outreach activities with the Lead Agency;
4. Maintain media relations jointly with the Lead Agency;
5. Assist the Lead Agency in maintaining the information repositories;
7. Conduct all public notice and hearing activities associated with the roll-out of the Proposed Plan.

7. MODIFICATION

This Site-Specific SMOA may be modified from time to time. Any Party shall propose any modification to the other Party in writing. Each Party is responsible for notice to the other Party of all proposed and actual modification to its statutory or regulatory authority, forms, procedures, or priorities that could impact activities conducted under the terms of this Site-Specific SMOA.

1. GENERAL PROVISIONS

1. Nothing in this Site-Specific SMOA is intended to either create any right in or grant any cause of action to any person not a Party to this Site-Specific SMOA or to release or waive any claim, cause of action, demand, or defense in law or equity that any Party to this Site-Specific SMOA may have against any person(s) or entity that is or is not a party to this Site-Specific SMOA. This Site-Specific SMOA is not a fund obligating document. Any contribution of funds from PRPs will be handled in accordance with applicable law and procedures.
2. The Parties recognize that each Party reserves all rights, powers, and remedies now or hereafter existing in law or in equity, by statute, treaty, or otherwise. Nothing in this Site-Specific SMOA is or shall be construed to be a waiver of the sovereignty of a signatory Party. This Site-Specific SMOA is intended solely for the purposes of facilitating inter-governmental cooperation between the Parties, and creates no rights in third parties or the right to judicial review.
3. EPA and WDNR will provide each other advance notice of any contemplated response enforcement or cost recovery action concerning the Site, and coordinate with and assist each other in such actions as appropriate.
4. Upon written request by EPA, WDNR will provide comments on technical documents within thirty (30) calendar days of receipt of such a request.

5. Nothing in this MOA waives or supersedes any state right under CERCLA regarding ARARs, ROD concurrence, and consent decree participation.

9. DISPUTE RESOLUTION

1. The Parties will use their best efforts to resolve disagreements informally.
2. If the Parties do not reach agreement through informal means, the Parties will use the following dispute resolution process:
 1. Any unresolved technical dispute will be promptly elevated to the first-line managers of the EPA RPM and WDNR Project Manager.
 2. If the Parties continue to disagree, the matter will be elevated to the next level of management, EPA's Branch Chief, and the WDNR Remediation & Redevelopment Program's Policy & Technical Resources Section Chief, who will work together to resolve the matter or decide the appropriate forum or means of ultimate resolution.

10. EFFECT & DURATION OF AGREEMENT

1. This Site-Specific SMOA shall take effect upon signature by EPA and WDNR.
2. This Site-Specific SMOA will remain in effect until signature of the Record of Decision or until terminated by mutual agreement of the Parties; provided however, that either Party to this MOA may terminate it by providing thirty (30) days written notice to the other Party.

11. THE UNDERSIGNED PARTIES enter into this MOA between the EPA and WDNR.

Wisconsin Department of Natural Resources

By: Scott Hansen Date: 5-17-04
P. Scott Hassett, Secretary

United States Environmental Protection Agency
Region 5

By: Richard C Karl for Date: 6-30-04
Bharat Mathur, Acting Regional Administrator

Appendix Q: Community Profile

Population. Ashland County has a population of 16,866 and covers a land area of 1,047 square miles. The City of Ashland (population 8,620) is the largest city in Ashland County, as well as the county seat. Other communities near Ashland include the towns of Sanborn (1,272) and White River (892). Washburn, a nearby community in Bayfield County, has one of the larger populations in the area at 2,280. The Bad River Indian Reservation, an area of 200 square miles, is located entirely within Ashland County and has a population of 1,538.

According to census estimates, the population of Ashland County and the City of Ashland have changed little since 1990. Ashland County grew by 3.3 percent between 1990 and 1999 (16,307 to 16,866). The City of Ashland dropped in population by 0.8 percent (8,695 to 8,620). This is consistent with the limited population growth in the region over the last 20 years.

Population figures for selected Ashland County communities.

	<u>1990</u>	<u>2000</u>	<u>% Change</u>
Agenda, Town	591	513	-15.2
Chippewa, Town	405	433	6.4
Gingles, Town	492	640	8.7
Jacobs, Town	885	835	- 6.0
Morse, Town	444	515	13.8
Mellen, City	972	845	-15.0
Ashland County's population distribution by age (percent) is as follows:			
Under 20 years	4,970 (29.46)		
20-64 years	9,260 (54.90)		
65 years and older	2,700 (16.00)		
[Census numbers from the US Census Bureau website, 2000 data; US Department of Commerce, Economic Development Administration website; WI Department of Health and Family Services web site, 2001 data).			

Local Governments The City of Ashland has a mayor and council form of government and a full-time city administrator, David Frasher. The City Council consists of 11 members, each elected to a two-year term. The Mayor, Fred Schnook, has a four-year term. Ashland County is governed by a twenty-one member Board of Supervisors. A twenty-one member Board of Supervisors governs Ashland County; a full-time county administrator, Tom Kiewig, collaborates with the County Board. The Bad River Band of Lake Superior Chippewa resides in Odanah. Donald Moore is the tribal chair. The Red Cliff Band of Lake Superior Chippewa is in Bayfield County, approximately 20 miles to the northwest of Ashland. The tribal chair is Raymond DePerry.

Education The Ashland School District is a composite of city and rural areas contained in approximately 422 square miles. More than 2,000 students attend the Lake Superior

Primary and Intermediate Schools (K-5), Ashland Middle School (grades 6-8), and Ashland High School (grades 9-12). A small number of private schools also operate in the city; the largest is Our Lady of the Lake Catholic School, a private grade school located within one block of the contamination site.

Ashland is home to Northland College, a private environmental, four-year liberal arts college. In 1971, the college developed a nationally recognized environmental studies curriculum. It is also home of the Sigurd Olson Environmental Institute, a regional environmental outreach organization.

Wisconsin Indianhead Technical College (WITC) is a two-year vocational/technical college in Ashland. The college offers associate degrees, technical diplomas, and continuing education courses. The college, through contracts with area employers, also provides customized training consisting of specific courses developed and taught by WITC instructors.

Work Force Ashland is a regional service center serving points to Ironwood, Michigan, to the east; Superior, Wisconsin, to the west; and Park Falls, Wisconsin, to the south. The county's work force has numbered between 7,500 and 8,000 individuals in the last 10 years. Unemployment has hovered between 6.5 percent and 8.5 percent during that period. The largest age-group growth in the work force, 38.3 percent, occurred for individuals between the ages of 40 to 54. All other workforce age groups either declined in growth or grew only slightly.